



**Commonwealth of Massachusetts
Board of Library Commissioners**

648 Beacon Street • Boston, Massachusetts 02215

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December 18, 1996

Office of the Secretary
Federal Communications Commission, Room 222
1919 M Street, N.W.
Washington, D.C. 20554

RE: 11/7 Universal Service Recommended Decision (CC Docket No. 96-45)

Dear Sirs:

Enclosed are the original and four copies of the Massachusetts Board of Library Commissioners' comments in the above docket. We are also forwarding a hard copy, plus diskette, of our comments to Sheryl Todd of the Common Carrier Bureau. In addition, we are sending one copy of the comments to International Transcription Service.

Sincerely,

Robert C. Maier
Head of Library Development

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BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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In the Matter of:)
)
Federal-State Joint Board on)
Universal Service)
_____)

CC Docket No. 96-45

**COMMENTS OF THE
MASSACHUSETTS BOARD OF LIBRARY COMMISSIONERS**

Thank you for the opportunity to comment on the Recommended Decision of the Federal-State Joint Board adopted on November 7, 1996 as required by Section 254 of the Telecommunications Act of 1996 regarding universal service.

We strongly support the general thrust of the Recommended Decision and urge the Commission to adopt a final decision in line with the basic framework recommended by the Joint Board.

We especially urge the Commission to support the recommended application of the Universal Service Fund to internal wiring and networking implementation and ongoing costs.

Comment Regarding Consortia of Schools and Libraries

Paragraph 578 of the Joint Board Recommendation discusses comments received relative to consortia of libraries and schools. The recommendation that addresses this issue is contained in paragraph 596. We commend the general thrust of the recommendation, that schools and libraries be permitted to aggregate costs through consortia of eligible and ineligible entities in order to establish the best pre-discount price for telecommunications services.

Two questions remain. First, the language in paragraph 596 states, "On careful review, we conclude that, despite the difficulties of allocating costs and preventing abuses, the benefits from permitting schools and libraries to join in consortia with other customers *in their community...*" (italics added). Does the phrase "in their community" mean within a single city or town, or does it refer to a defined service area? The North of Boston Library Exchange (NOBLE) whose comments are referenced in paragraph 578, serves 17 public libraries in 17 cities and towns. Would that area be considered a community? Would you consider changing the recommended language from "in their community" to "in their service area"?

Second, paragraph 596 seems to be based on a model where a consortium establishes the best pre-

discount price and then passes that price on to its members who in turn order services directly from the provider. We believe it is necessary to state that a consortium that includes eligible members is itself eligible for universal service discounts for services it purchases on behalf of its eligible members. This is important for three reasons.

First, in Massachusetts, ten automated library resource sharing networks serve over 75% of our 370 public libraries.

Second, automated library resource sharing networks such as NOBLE order all telecommunications services on behalf of their members from the appropriate service providers. Thus, the network pays the bills, is a single point of contact for most maintenance and repair calls and provides overall telecommunications network management. It would be counter productive to have to dismantle this method of operation just to qualify for the universal service discounts.

Third, certain telecommunications services can only be ordered and paid for by the consortium itself. For instance, a T1 line connecting an automated library resource sharing network to an Internet service provider can only be purchased by the network. Though the appropriate universal service discount for that line would be determined by the appropriate discounts of the eligible users and their proportional use of this line, it is nevertheless important to make clear that the consortium would be permitted to order this service and pay for it on behalf of its members.

We believe that necessary and appropriate audit and tracking methods can be adopted both by consortia and by telecommunications service providers to assure all parties of a fair application of the discount rules. Though there will be a cost to implement these audit requirements, it is clear to us that the resulting discounts will justify these costs.

We urge the Commission to make clear that consortia themselves are eligible for universal service fund discounts to the extent that they purchase services for eligible schools and libraries.

Respectfully submitted,

A handwritten signature in dark ink, reading "Robert C. Maier". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Robert C. Maier
Head of Library Development
Massachusetts Board of Library Commissioners
648 Beacon Street
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DATED: December 18, 1996

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